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*Attorneys for Defendants Culinary Workers Union  
Local 226*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LISA NIGRELLI, an individual,

Plaintiff,

vs.

VICTORIA PARTNERS d/b/a MONTE CARLO  
RESORT AND CASINO, as the employer;  
CULINARY WORKERS UNION, LOCAL 226;  
and DOES 1-50, inclusive,

Defendants.

CASE NO. 2:15-cv-01840-GMN-NJK

**AFFIDAVIT OF SAMSON EDEA IN  
SUPPORT OF LOCAL 226'S MOTION  
FOR SUMMARY JUDGMENT**

I, Samson Edea, declare:

1. I have personal knowledge of the following facts and if called, could and would testify competently thereto.

2. I was employed for training as an organizer with Culinary Workers Union Local 226 ("Local 226") from approximately May 2014 to June 2015. During this time, I was assigned to the Monte Carlo Casino ("Monte Carlo").

3. Local 226 is trying to unionize employees of Station Casinos. As part of that effort,

1 Local 226 has called for a boycott of Station Casinos. One of my duties as an organizer for Local 226  
2 was to educate union members about the boycott, including the reasons for it, and encourage them to  
3 support the boycott by not spending money at Station Casinos. I was required to explain to members  
4 that if Station Casinos remains nonunion, it will affect the wages and benefits in our collective  
5 bargaining agreements with unionized casinos. I estimate that I spoke to approximately 2,000 union  
6 members who patronize Station Casinos and encouraged them to stop.

7 4. In about April 2015, an employee at the Monte Carlo told me that there was a video on  
8 YouTube of Lisa Nigrelli's husband in connection with Station Casinos. The employee sent me a text  
9 with a link to the video. The video showed a man, whom I understood to be Ms. Nigrelli's husband,  
10 receiving a prize from Station Casinos because he was a customer.

11 5. On about April 8, 2015, I, along with my coworker Leo Batres, met Ms. Nigrelli in the  
12 Monte Carlo's employee cafeteria. We asked Ms. Nigrelli if her husband was a customer of Station  
13 Casinos, and told her about the boycott. We explained that Mr. Nigrelli should support the boycott  
14 because, as Ms. Nigrelli's husband, he is eligible for health insurance from the Culinary Fund. Our  
15 point was the one I have made to many union members. If they want to keep their health insurance  
16 benefits, then it is in their interest to support the boycott of Station Casinos. Neither Mr. Batres nor I  
17 threatened Ms. Nigrelli or yelled at her or did anything to try to intimidate her. Neither Mr. Batres nor  
18 I said anything about Ms. Nigrelli's schedule when we met with Ms. Nigrelli in the employee cafeteria.

19 6. I did not play any role in processing Ms. Nigrelli's grievance over the schedule change  
20 or deciding whether to submit that grievance to arbitration. Neither Esther Dyer nor anyone else  
21 discussed that grievance with me. I did not tell Esther Dyer, Johanna Dalton, or Richard McCracken  
22 about my conversation with Ms. Nigrelli in the employee cafeteria, about the YouTube video of  
23 Nigrelli's husband, or that Nigrelli's husband patronized Station Casinos.

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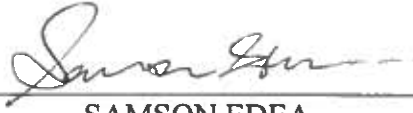
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1 I declare under the penalty of perjury of the laws of the United States and the State of Nevada  
2 that this declaration is true and correct. This declaration was signed by me on this 27 day of May  
3 2016 at Las Vegas, Nevada.  
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7 SAMSON EDEA  
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**CERTIFICATE OF SERVICE**

I am employed in the city and county of San Francisco, State of California. I am over the age of eighteen years and not a party to the within action; my business address is: DAVIS, COWELL & BOWE, LLP, 595 Market Street, Suite 800, San Francisco, California 94105.

On this 10th day of June, 2016, I caused to be served a true and correct copy of the above and foregoing:

• **AFFIDAVIT OF SAMSON EDEA IN SUPPORT OF LOCAL 226'S MOTION FOR SUMMARY JUDGMENT**

via ECF filing, properly addressed to the following:

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*Attorneys for Defendants Victoria Partners  
d/b/a MGM Resort and Casino*

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on this 10th day of June, 2016 at San Francisco, California.

/s/ Lesley E. Phillips  
Lesley E. Phillips

CERTIFICATE OF SERVICE

AFFIDAVIT OF SAMSON EDEA IN SUPPORT OF  
LOCAL 226's MOTION FOR SUMMARY JUDGMENT

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